

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF WISCONSIN**

Case No.: 09-33787
Judge: Susan V. Kelley
Chapter: Chapter 13

In Re: Todd C Leeser

**OBJECTION TO TRUSTEE'S MOTION TO DISMISS AND NOTICE OF
HEARING ON TRUSTEE'S MOTION TO DISMISS**

The Debtor, through Geraci Law, LLC, hereby submits this Objection to Trustee's Motion to Dismiss, and in support thereof, alleges as follows:

- (1) Debtor was on reduced hours due to lack of business temporarily. Debtor has filed a modified 100% plan to cure the arrearage.

PLEASE TAKE NOTICE that a telephone hearing will be held before the Honorable Susan V. Kelley, United States Bankruptcy Judge, on March 4, 2013 at 2:30 p.m. to consider the Trustee's Motion to Dismiss. The Court will initiate the conference call, usually within 30 minutes of the scheduled hearing time. **To appear by telephone, you MUST** contact the court (414-290-2660 or wiebml_kelley_chambers@wieb.uscourts.gov) prior to the hearing date to provide the name and telephone number of the person who will participate in the hearing. The Debtor is welcome, but not required to participate in this hearing.

Dated this Saturday, February 16, 2013.

By: /s/ Andrew M. Golanowski
Andrew M. Golanowski
Attorney of the Debtor
Bar #: 1055499

Andrew M. Golanowski
Law Offices of Peter Francis Geraci
2505 N. Mayfair Road, Suite 101 Wauwatosa, WI 53226 Phone: (414) 475-0100 Fax: (312) 332-6354 Email: wal@geracilaw.com

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CERTIFICATE OF SERVICE

The undersigned, an Attorney, does hereby certify that a copy of this Certificate of Service and a copy of the attached Objection to Trustee's Motion to Dismiss and Notice of Hearing were mailed First Class to the persons mentioned below, at their respective addresses, postage prepaid, by U.S. Mail in Milwaukee, WI on Saturday, February 16, 2013:

Todd Leeser
409 W State St
Burlington, WI 53105

Additionally, the documents referenced above were also served via electronic means on the following individuals on Saturday, February 16, 2013:

Mary B. Grossman
Chapter 13 Trustee
P.O. Box 510920
Milwaukee, WI 53203

Dated this Saturday, February 16, 2013.

By: /s/ Andrew M. Golanowski
Andrew M. Golanowski
Attorney of the Debtor
Bar #: 1055499

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